

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL NO. 98-1664 (CCC)
)	CIVIL NO. 98-2344 (CCC)
vs.)	Consolidated Cases
)	
33.92536 ACRES OF LAND, MORE)	
OR LESS, SITUATED IN VEGA BAJA,)	
COMMONWEALTH OF PUERTO RICO,)	
AND JUAN PIZA BLONDET, AND)	
UNKNOWN OWNERS)	
)	
Defendants.)	

**THE UNITED STATES' FIRST SET OF INTERROGATORIES
TO DEFENDANT JUAN PIZA-BLONDET**

In accordance with Federal Rules of Civil Procedure 26 and 33 and Local Rule 26 of this Court, Defendant Juan Piza-Blondet is hereby requested, within thirty (30) days after service hereof, to answer under oath and in writing the following interrogatories. Any objections to these interrogatories must be signed by the attorney making them.

INSTRUCTIONS

A. If an interrogatory cannot be answered in full, answer to the extent possible, please specify the reason(s) for your inability to answer the remainder, and state what information and knowledge you have regarding the unanswered portion. In addition to supplying the information asked for and identifying the specific documents referred to, please identify and describe all documents to which you referred in preparing your answers.

B. Please be advised that these interrogatories are continuing in nature. You are therefore under a duty to seasonably supplement your responses in accordance with Federal Rule

INTERROGATORY NO. 8:

Provide a complete statement of all expert and lay opinions that you intend to use at trial. This request includes a complete statement of all opinions to be expressed and the basis and reasons therefor; the data or other information considered by the witness in forming the opinions; any exhibits to be used as a summary of or support for the opinions; and the assumptions and calculations used by all lay and expert witnesses you intend to call at trial. This request also includes a complete statement of the methodology, facts, assumptions, and calculations used by landowner Juan Piza-Blondet in reaching his opinion of the amount of just compensation owed for the taking of the Subject Property.

ANSWER:

Respectfully submitted,

H.S. GARCIA
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2006, a true and correct copy of the foregoing Plaintiff's First Set of Interrogatories was served via email and by Federal Express addressed to:

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